

28 March 2024

MAA/RN/2024/03 - The MAA's Programme of Work for Regulations - Financial Year 24 / 25

Issue

1. To ensure that the Regulated Community (RC) and MAA Staff are informed of the planned Regulatory activity for Financial Year (FY) 24 / 25.

Scope

2. This Regulatory Notice (RN) details areas of the MAA Regulatory Publications (MRP) that will be subject to development and review in FY 24 / 25. It is provided to facilitate early engagement and elicit support from key stakeholders. It is not an exhaustive list and can be subject to change during the year.

Cross-Cutting Themes

3. **Defence Safety Authority (DSA) Direction.** In the coming year the MAA will continue to monitor developing and emerging technologies, in the military and civil aviation environments, to best enable the MAA to keep pace with emerging technologies and maintain a flexible, but robust approach, to developing new and adapting existing Regulation.

4. **Pan MRP activity.** There are several areas that will require pan-MAA interaction to complete the work:

- a. **Regulation of Defence Aviation other than that on the UK Military Aircraft Register.** Examination of the requirement for a new set of Regulations to cover non-UK military registered Aircraft.
- b. **Engagement across the MAA on new or novel aviation activity.** Investigation on the process for engaging with the MAA on new / novel aviation activity that is not traditional fixed or rotary wing (ie paramotoring, jetpacks, electric Vertical Take-Off and Landing (eVTOL) Aircraft, powered lift). This will include a review of the definition of 'Air Systems' in MAA02¹.
- c. **European Union Aviation Safety Agency (EASA) Part-IS (Information Security).** Post the publication of the EASA Part-IS Regulations which are being applied by the Civil Aviation Authority (CAA), the MAA Part-IS strategy will investigate any overlaps with JSP 440 and to determine whether future Information Security Regulation is required.
- d. **Release To Service (RTS) Recommendations (RTSR) MAA involvement.** Investigation into the depth and breadth of MAA involvement in reviewing / auditing / assuring RTSRs.

¹ Refer to MAA02 – MAA Master Glossary.

e. **Suitably Qualified and Experienced Person (SQEP) non-compliances.** During the global pandemic, Government-directed restrictions precluded the achievement of many MRP regulated currencies, leading to MAA published guidance regarding alternative approaches to compliance (MAA/RN/2020/04 and MAA/RN/2020/14). Due to the ability of the RC to maintain their business outputs and operational availability, and continued requests from the RC to allow locally authorizing of SQEP training non-compliances, the MAA will investigate the introduction of local authorizations for SQEP training non-compliances into the MRP. The Regulatory areas covered by the 2020 RNs were:

- (1) Air Safety Training (including Unit-Level Human Factors Training).
- (2) Aircrew / Controller Medicals and aviation medicine refresher training.
- (3) Military Continuing Airworthiness Manager (Mil CAM) and Deputy CAM (DCAM) competence requirements.
- (4) Aircraft Post Crash Management (APCM) LIVEX and TableTop exercises.
- (5) Aircrew currencies that did not already include Aviation Duty Holder (ADH) and Accountable Managers (Military Flying) (AM(MF)) authority to define or extend.

1000 Series: General Regulations

5. The Regulations Division ENG Branch plan to address known gaps in extant Regulation and review Regulatory Articles (RA) that the RC has identified as being unclear or ambiguous. The full extent of the MRP changes required is being considered; however, as a minimum, the following RA 1000 Series activity is planned:

- a. **RA 1164 – Transfer of UK Military Registered Air Systems.** Holistic review of the Regulatory set and consideration of the need to conduct Test and Evaluation (T&E) under RTS rather than a Military Permit To Fly.
- b. **Airborne Equipment (AE).** Review the AE RAs (RA 1150 – Airborne Equipment and Airborne Forces, RA 1240 – Chartering of Civilian Air Systems for Military Purposes, and RA 1345 – The Compendium of Airborne Equipment Release Certificates) to incorporate changes in the AE Regulatory environment, including the: provision of simplification and greater clarity on parachuting and despatch from Air Systems whilst in flight; reflection of changes in the chartering environment including appropriate ownership; etc.
- c. **Environmental Protection.** In collaboration with the Defence Environmental Protection Regulator, develop and publish Regulation to cover where current Regulation does not meet the national standard required by the Secretary of State for Defence in relation to Environmental Protection legislation.
- d. **RA 1002 – Airworthiness Competent Persons.** The RC have identified areas requiring simplification, clarification, and updating. A review will be undertaken to ensure that the RA remains fit for purpose.
- e. **RA 1020 – Aviation Duty Holder - Roles and Responsibilities.** Review to incorporate Annual Budget Cycle requirements.
- f. **RA 1223 – Airworthiness Information Management.** Following feedback from the RC and internal review within the MAA, this RA will be amended to improve Regulatory language and clarify the requirements on the RC.

- g. **RA 1230 – Design Safety Targets.** Review the applicability of numerical Safety Targets to Air Systems designed for MOD operation. This builds on the work of previous RA 1200 Series updates in previous periods.
- h. **RA 1340 – Equipment Not Basic to the Air System.** The RC have identified areas requiring simplification, clarification, and updating. A review will be undertaken to ensure that the extant RA remains fit for purpose.
- i. **RA 1350 – Air Launched Weapon (ALW).** Review to implement any outcomes of Defence Ordnance, Munitions and Explosives Safety Regulator and Defence Ordnance Safety Group activities examining the use of appropriate Safety Targets within the ALW environment.
- j. **RA 1400 Series and associated manuals (Flight Safety, Occurrence Reporting, Post Crash Management, and Air Safety Training).** The RC have identified areas requiring simplification, clarification, and updating. A review will be undertaken to ensure that the Regulatory set remains fit for purpose.
- k. **RA 1600 Series, associated manual, and RA 2320 (Remotely Piloted Air Systems (RPAS)).** During the 2021 – 2023 review and update of the RPAS Regulatory set, some activities were identified that require further investigation prior to implementation (eg: Specific Operations Risk Assessment v2.5 methodology, Predefined Risk Assessments, proportionate design organisation assurance, High Altitude Balloons and Tethered RPAS Operations, Traffic Management of Uncrewed Air Systems in non-segregated Airspace, Small Armed RPAS (Sub-25 kg) operating in the Open and Specific S1 sub-categories, Revision of RPAS-specific T&E (RA 2370) requirements, etc).

2000 Series: Flying Regulations

- 6. The Regulations Division Fly Team plan to review extant RAs to ensure they remain fit-for-purpose whilst also prioritizing Request For Change (RFCs) and Alternative Acceptable Means of Compliance (AAMC), Waiver and Exemption submissions. As in previous years, it is anticipated that there will be emergent work during this Programme of Work, likely in the novel and future capabilities areas. Specific RA updates include:
 - a. **RA 2370 – Test and Evaluation.** Work is ongoing to update the Regulation specifically on the definition of T&E and SQEP requirements for T&E to be conducted, especially with respect to RPAS to best capture the rapidly evolving requirement.
 - b. **RA 2340 – Supernumerary Crew, Supernumerary Support Crew and Passengers.** The recent update to RA 2135 (Aircrew Medical Requirements) requires concomitant amendment to this RA; this update will also include the incorporation of multiple AWE and RFC.
 - c. **RA 1166 – UK Civil-Registered Aircraft Utilized and Piloted by the Ministry of Defence.** A requirement to include management processes of RA 1166 Approvals and general updates.

- 7. Reviews will be conducted of the following:

Quinquennial and Out-of-Cycle Review

- a. RA 2115 – Aircraft Commanders.

- b. RA 2130 – Safety Equipment, Drills and Training.
- c. RA 2301 – Responsibility for an Air System.
- d. RA 2302 – Responsibilities in the Air.
- e. RA 2306 – Authorization of Flights.
- f. RA 2310 – Flight Procedures: Role Specific Fixed Wing.
- g. RA 2327 – Air Combat Manoeuvring, Basic Fighter Manoeuvres and Basic Helicopter Manoeuvres.
- h. RA 2335 – Flying Displays, Display Flying, Role Demonstrations and Flypasts.
- i. RA 2355 – Static Line and Freefall Parachuting.
- j. RA 2357 – Troop Insertions and Extraction Systems.
- k. RA 2360 – Portable Electronic Devices.

3000 Series: Air Traffic Management Regulations (ATM)

8. The Regulations Division ATM Branch will focus on updates in response to proposed amendments to International Civil Aviation Organization (ICAO) Standards and Recommended Practices (SARPs), and reviewing RAs that the RC has identified as requiring attention. This will be in addition to several areas of ongoing assessment including RPAS, Uncrewed Traffic Management and the Airspace Modernisation Strategy. The full extent of the MRP changes required is being considered against the impact of resource constraints due to churn in Q2; however, as a minimum, the following RA 3000 Series activity is planned:

- a. **Aerodrome Physical Characteristics.** ICAO will release updated SARPs describing new Aircraft Classification Rating / Pavement Classification Rating standards for runway and Aircraft categorization. This will replace the current Aircraft Classification Number / Pavement Classification Number system. These changes will be assessed, and RA 3511 updated accordingly and, if it is deemed necessary, suitable transition arrangements established.
- b. **Runway Visual Range (RVR).** In response to several RFCs, RA 3275 will be reviewed and an update released.
- c. **Instrument Landing System (ILS).** Evidence has been submitted describing inconsistencies in the provision of Air Traffic Services when providing or monitoring ILS approaches, across the RC. RA 3292 will be reviewed, and an update released.

9. Quinquennial Reviews will be conducted for the following MRP documents:

- a. RA 3519 – Permanent Fixed Wing Aerodrome – Visual Aids for Denoting Restricted Use Areas.
- b. RA 3536 – Domestic Helicopter Landing Sites – Services, Equipment, and Installations.
- c. RA 3224 – UK Flight Information Services.

4000 Series: Continuing Airworthiness Engineering Regulations

10. The Regulations Division ENG Branch plan to address known gaps in extant Regulation and review RAs that the RC has identified as being unclear or ambiguous. The full extent of the MRP changes required is being considered; however, as a minimum, the following RA 4000 Series activity is planned:

- a. **MRP Quality Terminology and Content.** An investigation will be conducted into the movement by the CAA towards the terminology of 'Compliance Management and Safety Management' in place of 'Quality Management' and analysis of potential impact to the MRP. In parallel the 4000 series will be reviewed to confirm whether it continues to provide sufficient guidance to the RC in terms of Quality Management and its assurance. This activity will also encompass a review of the requirement within RA 1005 to utilize a Nationally Accredited Quality System.
- b. **MRP Part 145.** After a significant number of updates and the triennial review, the focus is for a period of stability for the 4800 series. RFCs will continue to be investigated alongside the following topics:
 - (1) Review the Quality requirements in RA 4815 - Maintenance procedures and Safety and Quality Policy (MRP 145.A.65), to ensure that they are appropriate.
 - (2) Review the deltas between CAA's and the MAA's Part 145 training requirements with the view to closer align. Examples include fuel tank safety training.
 - (3) Investigate the role and responsibilities of the Accountable Manager (Maintenance) with the aim to ensure that the role and responsibilities are clear and appropriate.
 - (4) Investigate how the Part 145 Regulations can support Aircraft cross servicing between different nations.
- c. **MRP Part M.** The following MRP Part M workstrands will be conducted:
 - (1) **CAA / MAA Regulatory Mapping.** A standing task remains to regularly review updates to CAA Continuing Airworthiness Regulation. Likely areas of focus include changes to structure, as divergence from EASA continues, and further consideration of how to best regulate any known military deltas for those Military Registered platforms operated under CAA oversight through the provisions of RA 1165.
 - (2) **Fatigue management for Engineering Personnel.** An investigation into the requirement for Regulation on fatigue management for Engineering personnel will be undertaken.
- d. **Manual of Airworthiness Maintenance – Documentation (MAM-D) Part 1.** The MAM-D Part 1 will be amended to focus solely on the MOD Form 700 Series. Content with wider applicability will be moved to the MRP or Manual of Airworthiness Maintenance – Processes (MAM-P).

5000 Series: Type Airworthiness Engineering Regulations

11. The Regulations Division ENG Branch plan to address known gaps in extant Regulation and review RAs that the RC has identified as being unclear or ambiguous. The full extent of the

MRP changes required is being considered; however, as a minimum, the following RA 5000 Series activity is planned:

- a. **RA 5800 Series** – Integration of recent amendments to EASA Part 21 (amendments 11-13) into the RA 5800 Series. [Initial Airworthiness | Civil Aviation Authority \(caa.co.uk\)](https://www.caa.co.uk)
- b. **RA 5103 Certificate of Design** – Clarification of signatory requirements and responsibilities for Certificate of Design approvals.
- c. **Contracting for MRP Requirements** – In conjunction with the DAOS Branch conduct a review of the regulations covering ‘contracting organizations’ and flow through of sub-contracting arrangements.
- d. **RA 5865 Repairs (MRP Part 21 Subpart M)**– amendment of wording to improve clarity and provide greater delineation between definitions.

Overarching Documents and Manuals Update

12. **MAA01 – MAA Regulatory Principles.** Amend to implement recent updates to other MRP documents.
13. **MAA02 – MAA Master Glossary.** Amend to implement recent updates to other MRP documents.
14. **MAA03 – MAA Regulatory Processes.** Amend to implement recent updates to other MRP documents.
15. There are no planned updates of manuals (other than those detailed above) in this FY.

Further Information

16. Any observations, or requests for further guidance, on the content of this RN should be submitted by email to DSA-MAA-MRPEnquiries@mod.gov.uk, this will be forwarded to the relevant Head of Branch to staff accordingly.

MAA Head Regulation and Certification